

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

RODNEY ALLEN MCCOWAN

**09-10347-8-SWH
Chapter 7**

**RESPONSE TO MOTION TO REOPEN CHAPTER 7 CASE
AND STAY STATE COURT PROCEEDINGS**

COMES NOWS Bank of America, N.A. by and through undersigned counsel, and hereby responds to the Debtor's Motion to Reopen Chapter 7 Case and Stay State Court Proceedings (the "Motion") as follows:

1. The allegations in the Motion are generally denied.
2. The parties have agreed Bank of America shall be allowed until Friday, July 7, 2017 to supplement its response, as the undersigned counsel will be out of the office all next week.
3. Bank of America, N.A. requests that this matter be set for hearing.

This the 23rd day of June 2017.

/s/ Jason K. Purser

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing and annexed pleading or paper upon:

(Served via Electronic Notification)

William F. Braziel, III
William P Janvier
Samantha Y. Moore
The Janvier Law Firm
1101 Haynes St., Ste. 102
Raleigh, NC 27604

(Served via U Electronic Notification)

Rebecca F. Redwine
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4600 Marriott Drive, Suite 150
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Nicholls & Crampton, P.A.
PO Box 18237
Raleigh, NC 27619

by electronic mail, if applicable. Any party that can be served by electronic mail will receive no other form of notice.

This the 23rd day of June 2017.

/s/ Jason K. Purser

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